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Attorneys for Defendants STRUCTURE TONE, INC. s/h/a STRUCTURE TONE
(UK), INC. and STRUCTURE TONE GLOBAL SERVICES, INC.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE LOWER MANHATTAN DISASTER SITE
LITIGATION

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HECTOR BETANCOURT,

Plaintiff,

-against-

**NOTICE OF
ADOPTION**

07 CV 4453

ALAN KASMAN DBA KASCO, AMERICAN EXPRESS
BANK, LTD, AMERICAN EXPRESS COMPANY,
AMERICAN EXPRESS TRAVEL RELATED SERVICES
COMPANY, INC., BANKERS TRUST COMPANY,
BATTERY PARK CITY AUTHORITY, BFP ONE
LIBERTY PLAZA CO., LLC, BFP TOWER C CO. LLC.,
BFP TOWER C MM LLC., BLACKMON-MOORING-
STEAMATIC CATASTOPHE, INC. D/B/A BMS CAT,
BROOKFIELD FINANCIAL PROPERTIES, INC.,
BROOKFIELD FINANCIAL PROPERTIES, LP,
BROOKFIELD PARTNERS, LP, BROOKFIELD
PROPERTIES CORPORATION, BROOKFIELD
PROPERTIES HOLDINGS INC., BT PRIVATE
CLIENTS CORP., DEUTSCHE BANK TRUST
COMPANY, DEUTSCHE BANK TRUST COMPANY
AMERICAS, DEUTSCHE BANK TRUST
CORPORATION, ENVIROTECH CLEAN AIR, INC.,
GENERAL RE SERVICES CORP., GPS
ENVIRONMENTAL CONSULTANTS, INC., HILLMAN
ENVIRONMENTAL GROUP, LLC, INDOOR
ENVIRONMENTAL TECHNOLOGY, INC., KASCO
RESTORATION SERVICES CO., LEHMAN
BROTHERS HOLDINGS INC., LEHMAN BROTHERS,
INC., LEHMAN COMMERCIAL PAPER, INC.,

MCCLIER CORPORATION, MERRILL LYNCH & CO, INC., NATIONAL ASSOCIATION OF SECURITIES DEALERS, INC., NEW LIBERTY PLAZA LP, NEW YORK CITY ECONOMIC DEVELOPMENT CORPORATION, NEW YORK CITY INDUSTRIAL DEVELOPMENT AGENCY, NEW YORK CITY INDUSTRIAL DEVELOPMENT CORPORATION, ONE LIBERTY PLAZA, STRUCTURE TONE (UK), INC., STRUCTURE TONE GLOBAL SERVICES, INC., THE BANK OF NEW YORK TRUST COMPANY NA, THE BOARD OF MANAGERS OF THE ONE LIBERTY PLAZA CONDOMINIUM (CONDO #1178), THE ONE LIBERTY PLAZA CONDOMINIUM (CONDO #1178), TISHMAN INTERIORS CORPORATION, TRAMMELL CROW COMPANY, TRAMMELL CROW CORPORATE SERVICES, INC., WESTON SOLUTIONS, INC., WFP ONE LIBERTY PLAZA CO., L.P., WFP ONE LIBERTY PLAZA, CO. GP, CORP., WFP RETAIL CO. G.P. CORP., WFP RETAIL CO. L.P., WFP TOWER D CO. G.P. CORP., WFP TOWER D HOLDING CO. I L.P., WFP TOWER D HOLDING CO. II L.P., WFP TOWER D HOLDING I G.P. CORP., WFP TOWER D. CO., L.P., AND WORLD FINANCIAL PROPERTIES, L.P., ET AL,

Defendants.

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PLEASE TAKE NOTICE that defendants, STRUCTURE TONE, INC. s/h/a STRUCTURE TONE (UK), INC. and STRUCTURE TONE GLOBAL SERVICES, INC. (hereinafter "STRUCTURE TONE"), as and for their responses to the allegations set forth in the Complaint by Adoption (Check-Off Complaint) related to the Master Complaint filed in the above-referenced action, hereby adopts STRUCTURE TONE's Answer to the Master Complaint dated July 30, 2007, which was filed in the matter of *In Re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH).

To the extent that STRUCTURE TONE's Answer to the Master Complaint does not comprehensively address any of the specific allegations within the Check-Off

Complaint in the above-captioned matter, STRUCTURE TONE denies knowledge or information sufficient to form a belief as to the truth of such specific allegations.

WHEREFORE, STRUCTURE TONE, INC. s/h/a STRUCTURE TONE (UK), INC. and STRUCTURE TONE GLOBAL SERVICES, INC., demands judgment dismissing the above-captioned action as against it, together with its costs and disbursements.

Dated: New York, New York
September 8, 2007



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